

## **REMARKS**

This application has been carefully reviewed in view of the above-referenced Office Action, and reconsideration is requested in view of the following remarks.

In response to the Office Action mailed on August 30, 2007, Applicant wishes to enter the following remarks for the Examiner's consideration. Claims 1, 3-12, and 14-24 are pending in the application. No new matter has been added by amendment in this response.

### ***Drawings***

The drawings are objected to under 37 CFR 1.83(a), as noted on page two of the August 30, 2007 office action. Applicant respectfully submits that the drawings and description as filed do in fact show first and second output connectors. For example, the Examiner is respectfully directed to Figure 4, items 725 and 730, and the specification at page 15, lines 13-20.

### ***Claim Rejections – 35 USC 102***

Claims 1, 3-7 and 22-24 are rejected under 35 USC 102(e) as being anticipated by newly cited Turek et al. (U.S. 2004/0077214), hereinafter the '214 reference. Applicant respectfully traverses this rejection of the claims.

Not every element of the claims is taught or disclosed, as is required for a valid 102 rejection. Indeed, several elements of the claims are not taught, disclosed or otherwise anticipated by the '214 reference, as cited below:

#### **Regarding claim 1:**

##### **Claim 1 element 1**

B, Fig 1, page 2, paragraph 035, line 3 of '214 is not a bracket as the examiner claims. It is clearly identified by '214 as a BULKHEAD (page 2, paragraph 034, line 4; page 2, paragraph 034, line 5; page 2, paragraph 035, line 3; page 2, paragraph 035, line 4; page 2, paragraph 035, line 6; page 2, paragraph 035, line 8; page 2, paragraph 036, line 1; and in many other places in '214). A bulkhead and a bracket are physically separate and non-equivalent items.

Since no bracket has been identified by the examiner in '214 and because B is in fact a bulkhead, this recitation of the claim is not anticipated. In fact, applying the reference element B of the '214 reference to the instant claim would cause

element 1 of claim 1 would mean “a bulkhead having a bulkhead retaining portion”, and this does not make sense.

Furthermore, ‘214 item 10 is called a “bulkhead retaining portion” by the examiner. ‘214, however, identifies item 10 as an “electrical connection bulkhead header used to provide a connection..” (page 2, paragraph 034, lines 2-4) and a “bulkhead header used to provide a (electrical) connection...” (page 2, paragraph 034, lines 6-7), and “the header 10 is used to provide a readily ... connection to the inside components to permit readily disconnecting the component....” (page 2, paragraph 034, lines 11-14), and in numerous other places in ‘214. Since item 10 is an electrical connection device, and not a mechanical retaining device, it is clear that the recitation of element 1 for a “bulkhead retaining portion” is not met by element 10. Furthermore, item 10 is part of the bulkhead as it is termed a “bulkhead header” (see above).

### Claim 1 element 3

Item 60 of ‘214 is termed “barbs or catches” (page 3, paragraph 0042, line 10 of the ‘214 reference) and is thus not a retaining element as stated by the examiner. The examiner states that item 60 operates to couple the protective device to the bracket. The examiner has identified no bracket in ‘214. As shown above, the “bracket” the examiner talks about is in reality the bulkhead. The examiner further states that “wherein the bracket further comprises a protective device mounting portion”, which is untrue as nowhere does ‘214 show a protective device mounted to the bulkhead, either mechanical or electrical. The examiner also states that “the bracket (bulkhead) further comprises a protective device mounting portion (item 62) to which the protective device is coupled by the retaining portion”. Item 62 is referred to as “lips” (page 3, line 12), and it is not understood how they would anticipate the protective device mounting portion language of the pending claim. Furthermore, as discussed above, the examiner does not identify what he means by “retaining portion” and so this language of the claim is not taught or suggested by the ‘214 reference.

Applicant further notes, with reference to Claim 1 element 2, that item 30, Fig 3 of the ‘214 reference is clearly a mechanical cover that flips down to protect components from rain, etc. The present invention uses the term protective device to signify an electrical protection device like an electrical fuse/fuse holder and the third

element of the claim recites that the protective device is coupled to the bracket by the retaining element. This electrical coupling is different from a simply mechanical cover, as in the '214 reference.

The '214 reference has a protective device which is a plastic cap. No other protective device is taught by '214. The present invention teaches the inclusion of electrical protection devices, such as fuses. It is quite clear that given plastic caps it is nonobvious to substitute fuses for them, since the two are completely different both in structure and in characteristics such as rain protection which the plastic cap has but the fuse does not, or in electrical current limiting which is characteristic of fuses but not plastic caps.

Applicant has amended claim 1 to clarify meaning that was clear from the specification as filed. No new matter has been added.

In light of the foregoing, applicant must respectfully submit that the '214 reference fails to teach, disclose, or otherwise anticipate the recitations of independent claim 1. Claims 3-7 depend from claim 1. Similar arguments are applicable to claims 22-24

Moreover, with regard to the dependent claims, please consider the following:

#### Claim 3

The examiner claims item 62 is a tab portion of the bracket. Item 62 is identified as "lips" which are to mate with "barbs" (page 3, paragraph 0042, lines 12-13). These terms have no corollary or equivalent terms in the present invention, and the examiner does not explain or identify any. Also the "bracket" of the examiner is really a bulkhead, as explained previously. Additionally, Claim 3 is dependent on claim 1.

#### Claim 4

The bracket mentioned by the examiner is really a bulkhead, see above.

Also, claim 4 is dependent on claim 1.

#### Claim 5

Once again, since the bracket of the examiner is in reality a bulkhead, see above, I cannot make any sense of this. Claim 5 is dependent on claim 1.

#### Claims 6-7 and 24

Claims 6-7 are dependent on claim 1. Claim 24 is dependent on claim 23 which is dependent on claim 22.

Moreover, please consider the following. With reference to claim 6, nowhere in the '214 reference are first and second caps mentioned (what the examiner calls protective devices) (item 30, see above), as recited in claim 6. There are also no first and second tab portions of the bracket identified by the examiner and recited in claim 6. The "bracket" identified by the examiner is actually the bulkhead, see previous.

With regard to claim 7, nowhere does '214 mention a plurality of protective devices (examiner item 30) as recited in claim 7. Also see previous "bracket" comments.

With regard to claim 24, this claim recites first and second tab portions of the bracket, first and second protective device retaining devices to retain first and second protective devices to the first and second tab portions. These are not identified in '214 and are not identified by the examiner.

#### ***Claim Rejections – 35 USC 103***

Claims 8-9, 12, 14-17 and 19 are rejected under 35 U.S.C. 103(a) as being unpatentable over Turek et al. in view of Pearsall, Jr. (US Patent 3,965,397). Applicants respectfully traverse this rejection of the claims, particularly in light of the amendment to claims 8 and 19.

Applicant first notes that the examiner's interpretation/reading of the bracket (bracket assembly) in the '214 reference is inconsistent with the reading of the '214 reference used in the 35 USC 102 basis of rejection of the claims. The examiner now states that the bracket assembly is anticipated by element 28 of '214, a different position than the previous rejection in which the bracket was taught by element 10. '214 identifies 28 as a flange of bulkhead header 10. Paragraph 38 of '214 describes the operation of flange 28.

The rejection states that '214 teaches the recitations of the claims except for the connector being a power connector. While Applicant agrees that '214 fails to anticipate the connector being a power connector, there are other distinctions between the claimed invention and the '214 reference. As described at length above, '214 does not teach, disclose or suggest that a protective device is an electrical protective device.

The '214 reference has a protective device which is a plastic cap. No other protective device is taught by '214. The present invention teaches the use of

electrical protection devices, such as fuses, as opposed to mechanical protection such as plastic caps. It is quite clear that given plastic caps it is nonobvious to substitute fuses for them, since the two are completely different both in structure and in characteristics such as rain protection which the plastic cap has but the fuse does not, or in electrical current limiting which is characteristic of fuses but not plastic caps.

Further, it is not seen that the '397 reference is particularly relevant in this regard, in that it does not teach a removable bracket with fuses/fuse holders attached. In '397 the fuses are permanently mounted in a bulkhead, as is a power connector mating half. All that is removable is the power cord. '397 will not teach the substitution of electrical protective devices instead of plastic caps on a removable bracket in light of '214, or in light of anything else. It can not therefore be argued that the combination of the '214 and '397 references is suggested by the references themselves.

The independent claims have been amended to clarify this distinction; no new matter has been added.

#### ***Allowable Subject Matter***

Applicants note with appreciation that claims 10, 11 and 18 are objected to but would be allowable if rewritten in independent form. While Applicants agree that these claims recite patentably distinct subject matter, it is believed that because they depend from claims that are believed to also recite patentable subject matter, as discussed above, these claims should be allowable as written. Applicant do, however, reserve the right to depend these claims to be in independent form at a later date if so desired.

#### ***Conclusion***

In light of the foregoing amendment and remarks, Applicants respectfully submit that the references cited does not teach, suggest, disclose or otherwise anticipate, or obviate, the claim language of the pending claims. Applicants thus respectfully request that this basis of rejection of the claims be withdrawn and that a Notice of Allowance for these claims be mailed at the Examiner's earliest convenience.

Although additional arguments could be made for the patentability of each of the claims, such arguments are believed unnecessary in view of the above discussion. The undersigned wishes to make it clear that not making such

arguments at this time should not be construed as a concession or admission to any statement in the Office Action.

All claims are believed to be in allowable condition and such allowance is respectfully requested at the Examiner's earliest convenience. The Examiner is cordially invited to contact the undersigned if there are any questions about this application or response.

Respectfully submitted,

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